

From: "Coffey, Scott" <CoffeySE@cdmsmith.com>
To: "Gustavson, Karl" <Gustavson.Karl@epa.gov>
"Sheldrake, Sean" <sheldrake.sean@epa.gov>
CC: "Zhen, Davis" <Zhen.Davis@epa.gov>
Date: 3/9/2018 11:14:55 AM
Subject: RE: VOC sampling for SW, possible dispute deliberative2

The detections were for ethylbenzene in near bottom surface water at RM 6.4. (Detected concentrations ranged from 0.55 to 11.4 ug/L with only one sample exceeding the ROD specified CUL of 7.3 ug/L).

But baseline should come without bias right? Not collecting samples for ethylbenzene under the baseline round because it hasn't been detected in RI sampling for certain transect area presents a bias that we shouldn't accept. NDs for baseline are just as important as the detects.

Overview:

They agreed in the Work Plan to collect this VOC for Surface water. It's a Table 17 listed chemical for SW.

They didn't realize, until we brought it up in the review of their FSP, that compositing VOCs will likely cause volatilization and should be collected separately. They agreed with this, but then offered to only collect one sample near surface in the mid-channel rather than the 9 for full replication of what they agreed to do with the other parameters.

We came up with a reasonable compromise: Collect 3 samples (not 9) and focus them along the near bottom locations along the transect. This is equivalent to 14 additional samples. A \$50/sample analytical; probably \$2 /sample validation = \$730. To debate this, they are likely spending \$160+/hr with at least 6 representatives for at least 1 hr = \$960 and I'm probably underestimating this.

The choice seems pretty straightforward to me.

Scott

From: Gustavson, Karl [mailto:Gustavson.Karl@epa.gov]
Sent: Friday, March 09, 2018 10:46 AM
To: Sheldrake, Sean <sheldrake.sean@epa.gov>
Cc: Zhen, Davis <Zhen.Davis@epa.gov>; Coffey, Scott <CoffeySE@cdmsmith.com>
Subject: RE: VOC sampling for SW, possible dispute deliberative2

What's our history on finding VOCs in water when we sample? Are the samples at values that matter?

From: Sheldrake, Sean
Sent: Friday, March 09, 2018 1:42 PM
To: Gustavson, Karl <Gustavson.Karl@epa.gov>
Cc: Zhen, Davis <Zhen.Davis@epa.gov>; Scott Coffey <coffeyse@cdmsmith.com>
Subject: RE: VOC sampling for SW, possible dispute deliberative2

Karl, hard to tell. I think they might pick from the following

They don't feel like it.

The workplan didn't make it clear it would be included (the workplan wasn't clear or consistent on everything, let's face it)

Takes time to pump the sample

Costs money to collect the sample

Costs money to analyze

We pointed out that this is in bad faith/not consistent with their agreement to collect table 17 coc's. They say well collecting one sample here and there is consistent with that spirit, based on "where it was detected before" or "random".

S

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From: Gustavson, Karl

Sent: Friday, March 9, 2018 10:31 AM

To: Sheldrake, Sean <sheldrake.sean@epa.gov>

Cc: Zhen, Davis <Zhen.Davis@epa.gov>; Scott Coffey <coffeyse@cdmsmith.com>

Subject: RE: VOC sampling for SW, possible dispute deliberative

What's their rationale for not sampling VOCs?

From: Sheldrake, Sean

Sent: Friday, March 09, 2018 1:26 PM

To: Gustavson, Karl <Gustavson.Karl@epa.gov>

Cc: Zhen, Davis <Zhen.Davis@epa.gov>; Scott Coffey <coffeyse@cdmsmith.com>

Subject: VOC sampling for SW, possible dispute deliberative

Karl, The pre-RD group is refusing to do voc sampling for each horizon, all the way across the transect. In fact they are refusing to do all the way across even on the near bottom sampling location. They pitched random & biased to pick one location on near bottom. But our data set is weak, so I don't know that this is a good approach. I think we should push for all 3 locations near bottom given the lack of robustness of our data set.

Thoughts on this?

S

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